

**United States District Court
Southern District of New York**

MEMO ENDORSED

at page 7.

Wilfredo Torres,

MOTION TO COMPEL

Plaintiff

Re: 19CV6332 (ER) (KP)

-VS-

City of New York, et al.,

Defendants

RECEIVED
CLERK OF COURT
S.D. OF N.Y.
2020 JUN 16 AM 9:30

Please, take notice that Wilfredo Torres, Pro Se Plaintiff, hereby asks that an Order be issued compelling defendant City of New York, et al., to release the names and addresses of the defendants as ordered by this Court on February 7, 2020.

BACKGROUND INFORMATION:

1---The U.S. government publicly acknowledges that its own Central Intelligence Agency ("CIA") caused the controlled demolition of the World Trade Center on September 11, 2001 ("9/11") in which over three-thousand people were slaughtered steps away from this

-2-

Courthouse; blamed others; in Iraq alone slaughtered over 1-million innocent men, women, and children, and proudly declared "mission accomplished"; assigned billions of dollars to its fake "war on terror" at home and abroad; replaced the U.S. Constitution by a police-state; a totalitarian law called The Patriot Act; and a secret and omnipotent Court named Foreign Intelligence Surveillance Court. Exhibits 1,2,3,4.

2---Today, 19 years after 9/11, the U.S. Attorney for the Southern District of New York granted the request by the Lawyers' Committee for 9/11 Inquiry, Inc. for a grand jury to find-out who planted the explosives at the twin towers on that day. Exhibit 5.

3---As part of the fake "war on terror", on 9-28-2015, 4-28-2016, and 2-27-2019, the Central Intelligence Agency-Federal Bureau of Investigation-New York City Police Department Unit ("the CIA terrorists") that targets political dissidents carried-out warrantless

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raids of my apartment in Manhattan, New York City.

4---In the raid of 9-28-2015 they left a note with the word "intel", and the name of U.S. Department of Homeland Security employee Dennis McGowan as the terrorist that ordered the attack.

5---In the raid of 4-28-2016 I was handcuffed, kidnapped, and tortured. The highest-ranking NYPD official at the scene signed an affidavit affirming that the CIA terrorists did it.

6---I filed lawsuit 16CV2362 in this Court, which was assigned to Magistrate-Judge Kevin Nathaniel Fox, and Judge Ronnie Abrams, who from the very beginning protected the CIA terrorists while treating me like a criminal.

7---They were in fact giving the CIA terrorists a blank check for more attacks against me.

8---Judge Abrams' bias against me was such that I had to ask her recusal, but she denied it despite also having a major conflict

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of interest.

9---Although the crimes against me by the CIA terrorists continued, such as trying to break the door of my apartment to enter, on

9-28-2018 Judge Abrams issued a Order stating:

"plaintiff is directed not to file a new action related to these, or amended complaint, without Court permission". Docket 298.

10---On 2-27-2019 the CIA terrorists carried-out another warrantless raid of my apartment; I was arrested on bogus charges; removed from the apartment; while two of them stayed searching and ransacking.

Exhibit 6.

11---On 7-08-2019 I filed the present lawsuit 19CV6332 about the

2-27-2019 raid, which despite being part of the attacks of case

16CV2362 I was forced to ask Chief Judge Colleen McMahon to assign it to a different Judge in order to escape the persecution and abuse of Judges Fox and Abrams.

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The defendants did not object.

Months later the case was assigned to Your Honor and Magistrate-Judge Katharine Parker.

However, on 5-18-2020, long after the case was commenced, defendant City of New York, represented by Carolyn K. Dapoian, Esq., filed a MOTION TO CONSOLIDATE to assign both cases to Judges Fox and Abrams.

The motion was denied.

12---On 2-07-2020 Your Honor issued an Order directing defendant City of New York to release within sixty (60) days the names of all the defendants in order to be served.

13---Citing numerous irrelevant issues such as The Mayor of New York City, the Governor of New York, the pandemic, etc. etc. etc., at the end of that term defendant City of New York, Carolyn K. Depoian, Esq. filed another frivolous motion for an extension of sixty (60) more days.

-6-

Despite my objection, and although it was clear that the purpose of this defendant was to delay the proceedings, the motion was granted.

14---Yesterday, 6-08-2020, at the end of the term of sixty (60) days to provide the information, defendant City of New York, Carolyn K.

Dapoian, Esq., again filed another frivolous and delaying motion asking the Court for sixty more (60) days to provide the names that the Court ordered release on 2-07-2020.

This defendant again cites irrelevant matters such as Mayor William De Blasio, the coronavirus pandemic, the dysfunctional NYPD organization, etc. etc. etc. as reasons why its needs additional time to comply with the Court order.

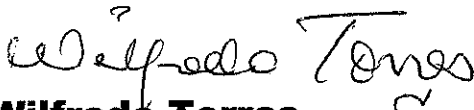
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CONCLUSION:

--The Court must stop the history of delaying tactics by defendant City of New York, Carolyn K. Depoian, Esq.,

--Their 6-08-2020 motion for sixty (60) more days to comply with the Order issued on 2-20-2020 must be denied.

--Severe penalties must be assessed against Carolyn K. Depoian, Esq. for using the Court as a toy.




Wilfredo Torres

**470 Second Avenue Apt. 2A
New York, N.Y. 10016**

Tel. 212-447-1737

Plaintiff's request that the Court deny the City's June 8, 2020 motion for an extension of time to identify the John Doe Police Officer Defendants is denied. Plaintiff's further request that the Court assess penalties on counsel for the City is also denied.

It is SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 6/18/2020

New York, New York

Copies Mailed to Plaintiff
Chambers of Edgardo Ramos

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Cc:

**Honorable Colleen McMahon,
Chief Judge
United States District Court
Southern District of New York
Courthouse
500 Pearl Street
New York, N.Y. 10007**

**Honorable Kevin Nathaniel Fox,
United States Magistrate-Judge
Southern District of New York
Courthouse
500 Court Street
New York, N.Y. 10007**

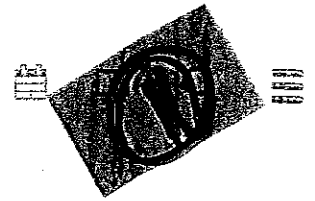
**Honorable Ronnie Abrams,
United States Judge
Southern District of New York
Courthouse
500 Pearl Street
New York, N.Y. 10007**

**Honorable Katharine Parker,
United States Magistrate-Judge
Southern District of New York
Courthouse
500 Pearl Street
New York, N.Y. 10007**

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**New York Legal Assistance Group
Attn. Jill Rosenberg, Esq.
Orrick, Herrington & Sutcliff, Law Firm
51 West 52nd. Street
New York, N.Y.10019**

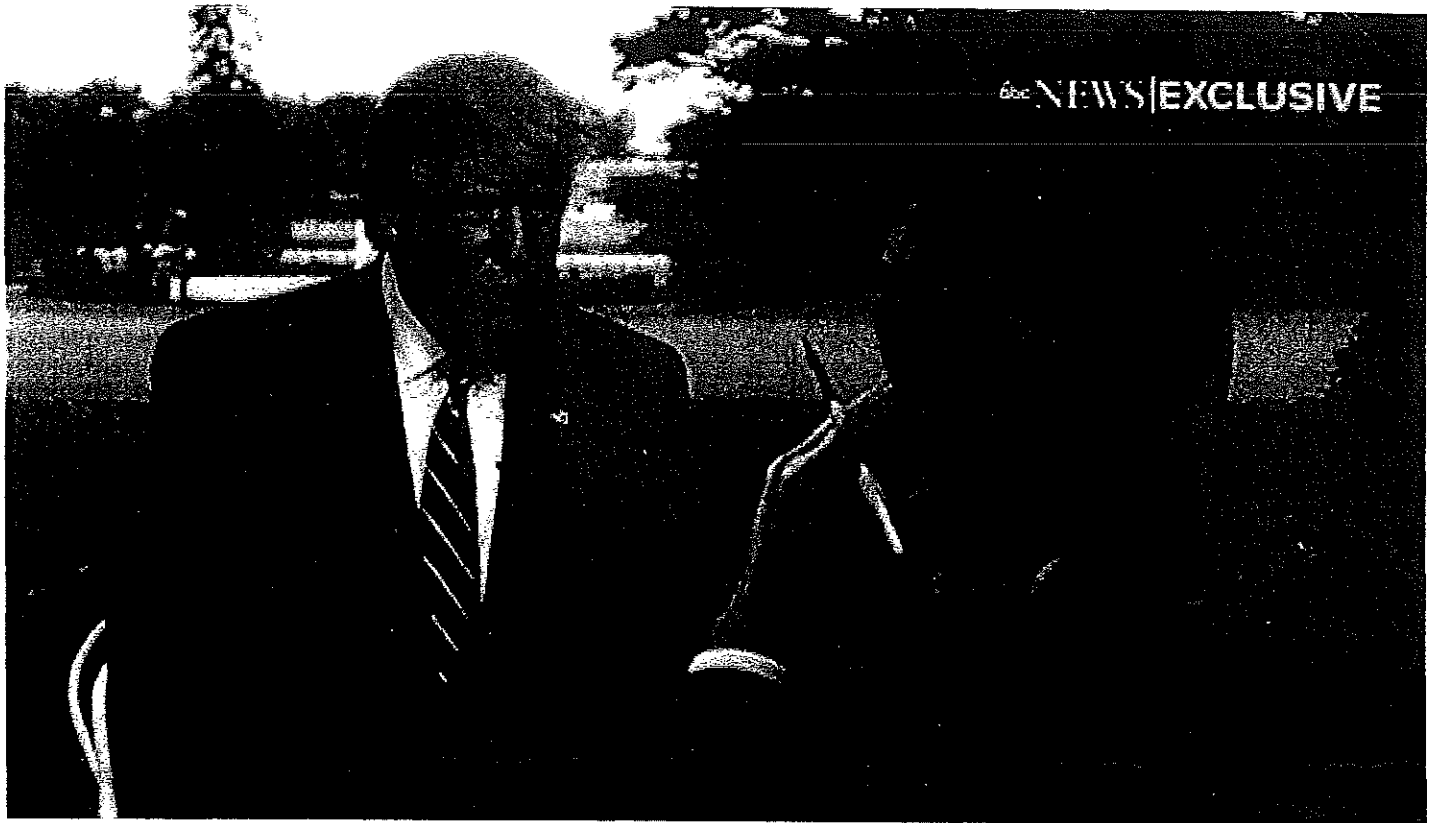
**City of New York-Law department
Attn. Carolyn K. Depoian, Esq.
100 Church Street
New York, N.Y. 10007**



'It was not Iraq. It were other people', says Trump

Home / US / Politics

Mon Jun 17, 2019 03:25PM [Updated: Mon Jun 17, 2019 05:57PM]



US President Donald Trump talked to ABC News' George Stephanopoulos on Sunday.

US President Donald Trump says he knows who was behind the September 11, 2001 terrorist attacks that left thousands of Americans dead.

In an exclusive interview with ABC News' George Stephanopoulos broadcast on Sunday, Trump categorically said that "Iraq did not knock down the World Trade Center."



Terror Watch List Counter: A Million Plus ^[1]

Why are there so many names on the U.S. government's terrorist list?

In September 2007, the Inspector General of the Justice Department reported ^[2] that the Terrorist Screening Center (the FBI-administered organization that consolidates terrorist watch list information in the United States) had over 700,000 names in its database as of April 2007 - and that the list was growing by an average of over 20,000 records per month.¹ (See also this new March 2008 report ^[3].²)

By those numbers, the list now has over one million names on it. Terrorist watch lists must be tightly focused on true terrorists who pose a genuine threat. Bloated lists are bad because

- they ensnare many innocent travelers as suspected terrorists, and
- because they waste screeners' time and divert their energies ^[4] from looking for true terrorists.

Watch list main page ^[5]

Airline security page ^[6]

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Source URL: <https://www.aclu.org/other/terror-watch-list-counter-million-plus#comment-0>

Links

[1] <https://www.aclu.org/other/terror-watch-list-counter-million-plus>

[2] <http://www.usdoj.gov/oig/reports/FBI/a0741/final.pdf>

[3] <http://www.usdoj.gov/oig/reports/plus/a0816/final.pdf>

[4] <https://www.aclu.org/privacy/gen/26535res20060824.html>

[5] <https://www.aclu.org/technology-and-liberty/watch-lists>

[6] <https://www.aclu.org/technology-and-liberty/airline-security>

DANIEL L. MEYERS
ATTORNEY-AT-LAW
350 BROADWAY, SUITE 308
NEW YORK, NY 10013
(212) 226-4106 (PHONE)
(212) 431-0107 (FAX)

May 23, 2006

Central Intelligence Agency
Information and Privacy Coordinator
Washington, D.C. 20505

Re: Freedom of Information Act Request
On behalf of Mr. Wilfredo Torres

Dear Information and Privacy Coordinator:

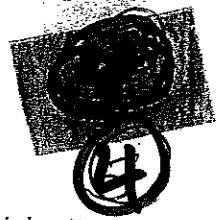
Your undersigned is the attorney for Mr. Wilfredo Torres, who has, in writing, authorized me to request on his behalf certain records and information from your agency as more fully described below. (Attached is the duly notarized authorization).

This letter constitutes a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), and the Privacy Act, 5 U.S.C. § 552a ("PA"). Similar requests have been submitted to the Transportation Security Organization ("TSA"), the Department of Justice ("DOJ"), the Department of Homeland Security ("DHS"), the Federal Bureau of Investigation ("FBI") and the National Security Agency ("NSA").

The following personal information is submitted to specifically identify the party in interest:

- Mr. Wilfredo Torres;
- 470 Second Avenue, Apt. 2A
New York, NY 10016;
- Date of birth, March 23, 1952;
- Place of birth, San Juan, Puerto Rico;
- Social Security number, 584-42-7541.

For many years, including 2006, Mr. Torres travels frequently between New York and Puerto Rico. His principle travel purpose is to visit with family. He has been designated wrongfully, by your agency and/or in concert with other governmental agencies and/or the airlines, as a person who poses or is suspected of posing "a threat to civil aviation." As a



"US Terrorism List Violates US Civil Liberties"

The Federal Bureau of Investigation, the national policing agency of the United States, admits to having compiled a "Terrorist Screening Database" with the names of persons suspected or alleged to be involved in terrorism.

The list contains the names of over a million people, who have been convicted of no crime and given no chance to defend themselves. One activity of the "Terrorism Screening Database" is the creation of the "No Fly List", which prevents thousands of people, including many US citizens, from boarding any aircraft. Once added to the list, things in their lives can become very difficult. Wilfredo Torres, suddenly found himself being subject to all kinds of harassment after he began protesting discrimination in travel policies. In one instance he was removed from a flight by airline officials. When Mr. Torres lawyer filed a request for information, the FBI revealed that it had collected over 100 pages of information about him. He now wants to have his name removed from the list. The FBI and other divisions of the US Department of Justice, have a long history of suppressing political dissidents over the last several decades. A law suit has been filed by the American Civil Liberties Union, in the hopes that courts will intervene and halt the continued use of such lists.

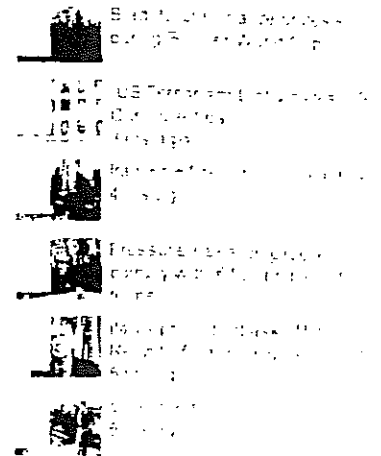
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Caleb Maupin, Press TV New York

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Is the war against Syria's government a freedom-seeking battle, or a terrorist one?

- ☐ 1) It is a battle waged by freedom-seeking forces
- ☐ 2) It is a battle waged by foreign-backed terrorists



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Breakthrough: U.S. Attorney Agrees to Present Evidence of WTC Demolition to Federal Grand Jury

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Finally, after 17 long years, the 9/11 Truth Movement has opened an avenue to prosecuting those responsible for the shocking destruction of the World Trade Center and the horrible loss of life that resulted.

In April 2018, the Lawyers' Committee for 9/11 Inquiry — together with more than a dozen 9/11 family members and with help from AE911Truth — filed a petition with the U.S. Attorney in Manhattan demanding that he present evidence of unprosecuted federal crimes at the World Trade Center to a special grand jury. Then, in November, came the big news: The U.S. Attorney notified the Lawyers' Committee (<https://www.ae911truth.org/images/PDFs/US-Attorney-Letter-110718.pdf>) in writing that he would comply with the provisions of 18 U.S.C. § 3332 requiring him to relay their report to a special grand jury.

Now the Lawyers' Committee and AE911Truth are working to ensure a *thorough and successful* grand jury investigation.



Wilfredo Torres
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New York, N.Y. 10016

EX-107
JUN 18 2020

Honorable Katharine Parker,
United States Magistrate-Judge
Southern District of New York
Courthouse
500 Pearl Street
New York, N.Y. 10007

S.D. N.Y.

JUN 16 10:56 AM '20

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